

American Federation of Government  
Employees, et al., Plaintiffs,

v.

United States of Personnel Management, et  
al., Defendants

No. C 25-01780 WHA

**DECLARATION OF ARRON HELM**

Pursuant to 28 U.S.C. § 1746, I, Arron Helm declare as follows:

1. I am the Chief Human Capital Officer, Office of Human Resources Management, at the General Services Administration headquartered in Washington, D.C. I have served in this position since July 2024. In my role at the General Services Administration, I am responsible for personnel management. I am responsible for overseeing the personnel enterprise and tracking and recording of personnel actions, including terminations. I assist in ensuring that all personnel actions comply with federal law, including those related to probationary employees.

2. As of Thursday, October 23, 2025, I have received and read the Order on Cross-Motions for Summary Judgment in the case of American Federation of Government Employees, AFL-CIO, et al., Plaintiffs, v. United States Office of Personnel Management, et al., Defendants, No. C 25-01780 WHA, dated on September 12, 2025, by United States District Judge William Alsup.

3. In compliance with the requirements of that order, GSA has completed the following actions:

- a. Removed all references to terminations from the employee personnel files (including SF-50s) of any GSA probationary employee who received a termination notice as a result of OPM's February 2025 termination directive and instructions. This was completed on or about March 17, 2025.

- b. Confirmed any terminations of GSA probationary employees who were terminated, rehired pursuant to Court order, then terminated again upon a stay of that order were not made retroactive to the date of the first termination.
  - c. Issued corrective notices to GSA terminated probationers, including those whose terminations were rescinded, stating that they were not terminated on the basis of personal performance. These notices were individually addressed and were sent on Friday, November 7, 2025. A sample notice is attached to this declaration.
4. GSA did carry out twenty-one (21) terminations of probationary employees in May and June 2025, in accordance with Executive Order 14284, "Strengthening Probationary Periods in the Federal Service" (April 24, 2025), and the Office of Personnel Management's Initial Guidance issued April 28, 2025. Terminated employees were informed that their continued employment did not meet the needs or interests of the agency nor advance its organizational goals.
5. GSA also conducted a limited number of probationary terminations after an individualized evaluation of an employee's performance of fitness. The Agency is providing a separate declaration under oath and seal regarding the reasoning and documentation for those terminations.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Date: November 13, 2025

*Arron E Helm*

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Arron Helm

Attachment

## Subject: Compliance with Court Order



[REDACTED]  
[REDACTED]  
[REDACTED]  
General Services Administration

1800 F Street N.W.

Washington, DC 20405

November 7, 2025

[REDACTED]

[REDACTED]

[REDACTED]

This corrective notice is provided to you pursuant to an order issued on September 12, 2025, by the United States District Court for the Northern District of California in *Government Employees v. U.S. Office of Personnel Management*, No. 3:25-cv-1780-WHA (N.D. Cal.). Per that order, the General Services Administration is required to inform you that you were not terminated on the basis of your personal performance. The order also requires the GSA to update your personnel file, including your SF-50, to reflect that your termination was not based on your personal performance.

As required by Paragraph 5 of the district court's order, the GSA informs you that you were not terminated on the basis of your personal performance.

As required by Paragraph 3 of that order, GSA has updated your personnel file, including your SF-50, to reflect that your termination was not based on your personal performance.

Sincerely,

[REDACTED]

Deputy Director, HR Services

Director, Workforces Relations

Office of Human Resources Management